

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re

WORLEY & OBETZ, INC., *et al.*,¹

Debtors.

CHRISTINE C. SHUBERT, Chapter 7
Trustee for the Estates of Worley & Obetz,
Inc., *et al.*;

Plaintiff,

vs.

ROBERT SETH OBETZ, an individual;
ROBERT W. OBETZ, JR., an individual;
JEFFREY B. LYONS, an individual;
JUDITH A. AVILEZ, an individual;
KAREN L. CONNELLY, an individual;
MARJORIE S. OBETZ, an individual;
MELISSA OBETZ, an individual;
JULIE LYONS, an individual;
MOLLY S. OBETZ, an individual;
SAMUEL J. OBETZ, an individual;
HOWARD W. CRAMER, JR., an
individual;
KATHLEEN A. CRAMER, an
individual;
MICHELE K. KLUSEWITZ, a/k/a
MICHELE KELLY, an individual;
149 DOE RUN ROAD, LP, a
Pennsylvania limited partnership;
149 DOE RUN ROAD, GP, LLC, a
Pennsylvania limited liability company;
202 GREENFIELD, LP, a Pennsylvania
limited partnership;

CHAPTER 7

Case No. 18-13774 (MDC)
(Jointly Administered)

Adv. No. 18-00235 (MDC)

Hearing Date: December 2, 2020 at 10:30 a.m.
(EST)

Obj. Deadline: Nov. 18, 2020 at 4:00 p.m. (EST)

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers are (i) Worley & Obetz, Inc. (6576) (Case No. 18-13774-MDC); (ii) Americomfort, Inc. (7605) (Case No. 18-13775-MDC); (iii) RPHAC, Inc. (9625) (Case No. 18-13776-MDC); (iv) Amerigreen Energy, Inc. (6284) (Case No. 18-13777-MDC); (v) Advance Air, Inc. (8111) (Case No. 18-13778-MDC); (vi) Amerigreen Energy Brokers, LLC (2358) (Case No. 18-13779-MDC); (vii) Amerigreen Electricity, LLC (8977) (Case No. 18-13780-MDC); (viii) Amerigreen Hedging Services, LLC (8549) (Case No. 18-13781-MDC); (ix) Amerigreen Lubricants, LLC (7489) (Case No. 18-13782-MDC); (x) Amerigreen Natural Gas, LLC (3222) (Case No. 18-13783-MDC); and (xi) Amerigreen Propane, LLC (Case No. 18-13784-MDC).

202 GREENFIELD GENERAL, LLC, a Pennsylvania limited liability company;
535 STIEGEL VALLEY ROAD, LLC, a Pennsylvania limited liability company;
DOE RUN ROAD, LLC, a Pennsylvania limited liability company;
OL PARTNERS, LLC, a Pennsylvania limited liability company;
G-FORCE SPORTFISHING, INC., a Delaware corporation;
JW BISHOP PROPERTIES, LLC, a Pennsylvania limited liability company;
LYONS & OBETZ, a Pennsylvania general partnership;
JSB RETENTION, LLC, a Pennsylvania limited liability company;
SETH ENERGY, LLC, a Pennsylvania limited liability company; and
SHIPLEY ENERGY COMPANY, a Pennsylvania corporation;

Defendants.

CERTIFICATION OF COUNSEL REGARDING REVISED PROPOSED ORDER ON CHAPTER 7 TRUSTEE’S MOTION FOR AN ORDER APPROVING SETTLEMENT AGREEMENT BY AND AMONG THE CHAPTER 7 TRUSTEE AND DEFENDANTS

JESSE M. HARRIS, of full age, hereby certifies as follows:

1. I am an associate with the law firm of Fox Rothschild LLP (“Fox Rothschild”), attorneys for Christine C. Shubert (the “Trustee”), Chapter 7 trustee for the estates of Worley & Obetz, Inc., *et al.* (the “Debtors”).

2. On October 28, 2020, Fox Rothschild filed the *Motion for an Order Approving Settlement Agreement by and among the Chapter 7 Trustee and Defendants* (the “Motion”) [D.I. 1148] [A.D.I. 258].

3. On November 18, 2020, Doe Run Realty Partners, LP (“Doe Run LP”) filed a *Limited Objection to the Motion for an Order Approving Settlement Agreement by and among the Chapter 7 Trustee and Defendants* (the “Limited Objection”) [D.I. 1162] [A.D.I. 262].

4. Doe Run LP and the Trustee have resolved Doe Run LP's Limited Objection.
5. Paragraphs "C," "2," and "3" in the attached revised proposed form of order (the "Revised Order") reflects the mutually agreed upon changes requested by Doe Run LP and agreed to by the Trustee. A clean copy of the Revised Order is attached hereto as **Exhibit "A"**. A "blacklined" comparison copy of the Revised Order is attached hereto as **Exhibit "B"**.

Respectfully submitted

FOX ROTHSCHILD LLP

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Dated: December 1, 2020

*Counsel for Christine C. Shubert,
Chapter 7 Trustee for the Debtors*